

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**RENTAL SOLUTIONS, LLC, Plaintiff**

**Case No. C 07-4929 JL**

**vs.**

**RULE 26(f) REPORT OF PARTIES**

**CENTRAL VALLEY CONSTRUCTION, INC.  
et. al., Defendants.**

1. Pursuant to F.R.Civ.P. 26(f), a meeting was held on December 18, 2007, and was attended by:

STAN D. BLYTH, counsel for Plaintiff RENTAL  
SOLUTIONS, LLC, and

THOMAS EASTMOND, counsel for Defendants TPA-CKY  
JOINT VENTURE, CKY, INC., TAN PHUNG &  
ASSOCIATES, and AMERICAN CONTRACTORS  
INDEMNITY COMPANY

2. **Consent to Magistrate Judge.** The parties do not unanimously consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. §63(c).

3. **Initial Disclosures.** The parties have exchanged the initial disclosures required by Rule 26(a)(1).

4. **Jurisdiction and Venue.** At the present time, there are no contested matters as to jurisdiction or venue.

5. **Discovery.**

a. Other than as set forth in the recommended Discovery Plan below, no changes should be made in the limitations set forth on discovery in the Federal Rules of Civil Procedure.

b. The parties propose the following discovery plan:

**Interrogatories:** Plaintiff RENTAL SOLUTIONS and Defendants TPA-CKY JOINT VENTURE, CKY, INC. ("CKY"), TAN PHUNG & ASSOCIATES ("TPA"), AMERICAN CONTRACTORS INDEMNITY COMPANY ("AMERICAN") (collectively), and Defendant CENTRAL VALLEY shall each be allowed 50 written interrogatories pursuant to FRCP 33.

**Requests for Admission.** Plaintiff RENTAL SOLUTIONS and Defendants TPA-CKY JOINT VENTURE, CKY, TPA and AMERICAN (collectively), and Defendant CENTRAL VALLEY shall each be allowed 50 requests for admission under FRCP 33.

**Depositions:** Plaintiff RENTAL SOLUTIONS and Defendants TPA-CKY JOINT VENTURE, CKY, TPA, and AMERICAN (collectively), and Defendant CENTRAL VALLEY shall each be allowed up to 6 depositions on oral examination.

**Requests for Production.** Plaintiff RENTAL SOLUTIONS and Defendants TPA-CKY JOINT VENTURE, CKY, TPA, and AMERICAN (collectively), and Defendant CENTRAL VALLEY shall each be allowed 25 requests for production under FRCP 34.

c. The parties to this report propose the following deadlines.

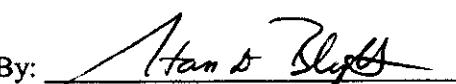
<b>Discovery Cut-Off Date:</b>	<b>July 1, 2008</b>
<b>Last Date for Dispositive Motions to be Heard:</b>	<b>September 1, 2008</b>
<b>Final Pretrial Conference:</b>	<b>October 15, 2008</b>
<b>Trial Date:</b>	<b>November 3, 2008</b>

- d. There are currently no issues regarding electronic discovery.
- e. There are currently no issues regarding privilege; however, the Court's order should include how claims of privilege can be asserted after production.
- f. Discovery will be required concerning the amounts owing for the rental of equipment by Defendant CENTRAL VALLEY CONSTRUCTION, INC. ("CENTRAL VALLEY") from Plaintiff RENTAL SOLUTIONS, the alter ego use of CENTRAL VALLEY by its principals; and related issues of express and equitable indemnity.
- g. The parties do not believe that discovery in this matter can be handled on an expedited basis.

h. The parties do not believe that any items of discovery can be deferred pending settlement discussions.

Dated: December 19, 2007

**THE LAW OFFICES OF STAN D. BLYTH**  
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By:   
STAN D. BLYTH, Attorneys for Use  
Plaintiff RENTAL SOLUTIONS, LLC

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By:   
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INDEMNITY COMPANY